



1 report, which is an error. Defendant wishes to withdraw the argument that Plaintiff's Formal EEO  
2 complaint was untimely filed. *See* Dkt. No. 15 at Section III(C)(1).

3 3. Based on the foregoing, the parties stipulate and agree that Defendant may file an  
4 amended motion to dismiss on June 3, 2016 correcting the above-referenced fact and withdrawing the  
5 affected argument. Defendant will not add any new argument to the amended motion.

6 4. Plaintiff will have the requisite fourteen days to oppose the amended motion, and  
7 Defendant will have seven days to respond.

8 5. The parties stipulate and agree to a July 14, 2016 hearing date for the amended motion.

9 DATED: June 3, 2016

Respectfully submitted,

10 /s/ Maureen E. McFadden

11 MAUREEN E. McFADDEN

Counsel for Plaintiff

12 DATED: June 3, 2016

Respectfully submitted,

13 BRIAN J. STRETCH

14 United States Attorney

15 /s/ Ann Marie Reding<sup>1</sup>

16 ANN MARIE REDING

17 Assistant United States Attorney

Attorneys for Defendant

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28 <sup>1</sup> I, Ann Marie Reding, hereby attest that I obtained the concurrence in the filing of this  
document of all signatories whose signatures are represented by /s/.